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September 14, 2020

Hon. Lewis A. Kaplan

United States District Judge

Southern District of New York

500 Pearl Street

New York, NY 10007

MEMO ENDORSEMENT

Application granted. The 9/23/2020 status conference is adjourned until 10/20/2020 at 2:00 PM. In the event a disposition is reached regarding either defendant, the change of plea hearing is referred to the magistrate. Time from today through and including 10/20/2020 is excluded from speedy trial calculations in the interests of justice in order that the parties may continue to review discovery, discuss any potential dispositions, and accommodate any delays due to the ongoing pandemic.

Via ECF and email to Andrew.Mohan@nysd.uscourts.gov So Ordered: _____

.....~~Re: United States v. Delgado~~ Hon. Lewis A. Kaplan,

Dated: 9/15/2020

19 Cr. 817 (LAK)

Dear Judge Kaplan:

We represent the defendant Daniel Cuevas pursuant to the Criminal Justice Act. I am writing with the consent of the Government (AUSA Jacob Warren) and counsel for the remaining co-defendant, Mario Delgado (Daniel Parker, Esq.), to request an adjournment of the conference in this matter, presently scheduled for September 23, for approximately 30 days thereafter. The reason for this request is that counsel for both defendants are discussing disposition of the case with the Government, as well as continuing to review the discovery in the case, which involves Title III wiretap interceptions. The ongoing restrictions relating to the Covid-19 pandemic are also a factor that impedes progress in innumerable ways and makes communications and appearances difficult at present.

Both defendants consent to a waiver of Speedy Trial time until the new conference date. Mr. Warren, Mr. Parker and I are in contact with Your Honor's Courtroom Deputy, Mr. Mohan, if there are any questions or concerns that need to be addressed relating to this request.

Very truly yours,

Bennett M. Epstein

Bennett M. Epstein

cc. (via email) to Jacob Warren and Daniel Parker.